

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<p>ROBERT MCKEON</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>CITY OF ASBURY PARK, MAYOR JOHN MOOR, AND MICHAEL CAPABIANCO</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 3:19-cv-08536-MAS-ZNQ Judge Michael A. Shipp</p> <p style="text-align: center;"><u>Filed Electronically via ECF</u></p> <p style="text-align: center;">CERTIFICATION OF TERESA LENTINI IN SUPPORT OF APPLICATION TO ENFORCE SETTLEMENT AGREEMENT</p>
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I, Teresa M. Lentini, certify the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner with the law firm Florio Perrucci Steinhardt Cappelli Tipton & Taylor, LLC, counsel for Defendants, in the above-captioned matter.
2. Attached hereto as Exhibit A is a true and correct copy of the August 28, 2019 Term Sheet.
3. Attached hereto as Exhibit B is a true and correct copy of the October 4, 2019 email from Teresa Lentini, Esquire to Patricia Barasch, Esquire with attached draft Settlement Agreement and Release
4. Attached hereto as Exhibit C is a true and correct copy of the October 24, 2019 email from Patricia Barasch, Esquire to Teresa Lentini, Esquire with attached Plaintiff's red line to Defendants' draft settlement agreement and release.
5. Attached hereto as Exhibit D is a true and correct copy of the December 4, 2019 email from Teresa Lentini, Esquire to Patricia Barasch, Esquire with attached Defendants' mark up to Plaintiff's red lined draft settlement agreement and release.

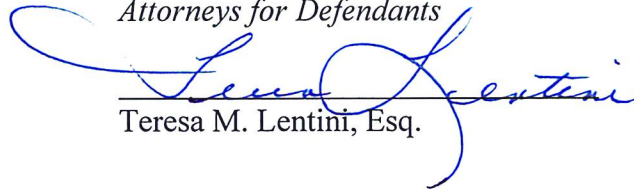
6. Attached hereto as Exhibit E is a true and correct copy of the December 19, 2019 email of Patricia Barasch, Esquire to Teresa Lentini, Esquire and attached October 24, 2019 Plaintiff red line to Defendants' draft settlement agreement and release.

7. Attached hereto as Exhibit F is a true and correct copy of the March 2, 2020 email Patricia Barasch, Esquire to Teresa Lentini, Esquire and attached CLEAN Proposed Final Agreement.

8. Attached hereto as Exhibit G is a true and correct copy of the "Compare" of Plaintiff's March 2, 2020 Clean Proposed Final Agreement and Defendants' October 4, 2019 original draft Settlement Agreement and Release.

9. Attached hereto as Exhibit H is a true and correct copy of Defendants' Clean Final Settlement Agreement and Release and is also attached to the Proposed Order.

**FLORIO PERRUCCI STEINHARDT
CAPPELLI TIPTON & TAYLOR, LLC**
Attorneys for Defendants



Teresa M. Lentini, Esq.

Dated: 3-6-20